## Results on Appendix W Survey

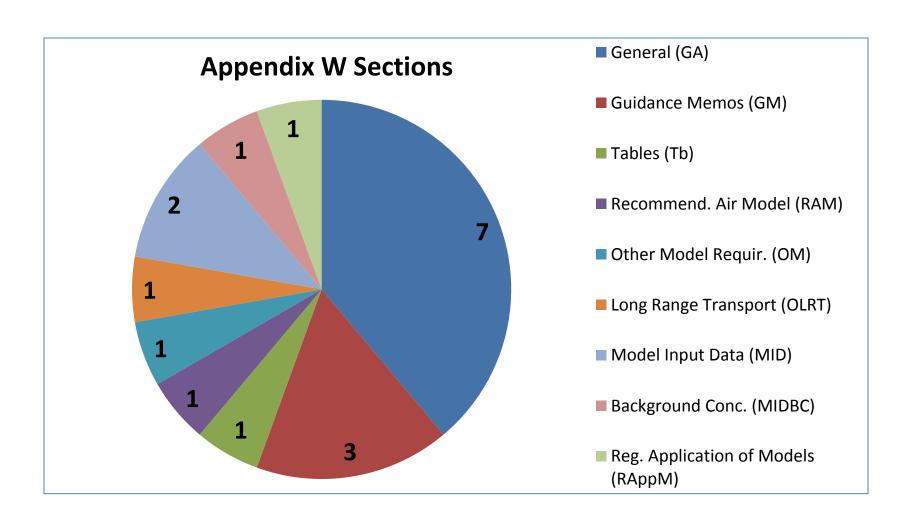
Jillian Baker and Melissa Sheffer
May 21, 2014
Salt Lake City, UT
EPA R/S/L Modelers' Workshop

- Purpose: to provide feedback to the U.S. EPA, from the state and local regulatory agencies' perspective, on revisions needed to Appendix W
- Survey was sent to state and local modelers, via our modeling contacts email list
  - 161 individuals
  - 14 respondents (8.7% response rate)
- Respondents were evenly split between Regions
   1 5, and Regions 6 10

- 1. How has Appendix W been helpful to you in developing and defending a modeling demonstration? (Please provide examples)
- How has Appendix W been a barrier to developing and/or defending a modeling demonstration? (Please provide examples)
- 3. Consider your responses to questions 1 and 2. Based on these responses, what changes would you like to see made in a revision to Appendix W? (Please provide examples)
- 4. If you have needed to address the need of an alternative model, does Appendix W provide enough information for you to make on a decision on the selection of an alternative model? (Please provide details)
- 5. Do you find the tables in Appendix W useful?
- 6. If no to the previous question, which tables should be removed from Appendix W? (Check all that apply)
- 7. Should any tables be added to Appendix W?
- 8. If yes to the previous question, what tables should be added to Appendix W?
- 9. Please provide your contact information. This information will not be used to for purposes of response identification. All responses will remain anonymous.

Code	Appendix W Sections
GA	General
GM	Guidance memos
Tb	Tables
RAM	Recommended Air Models (3.0)
RAMA	Use of Alternative Models (3.2)
SSM	Stationary Source Models (4.0)
MF	Models for (5.0)
MNO2	NO2 (5.2.4)
MPM25	PM2.5 (5.2.2.1)
MO3	03 (5.2.1)
OM	Other Model Requirements (6.0)
OLRT	Long Range Transport (6.2.3)
G	General Modeling Considerations (7.0)
MID	Model Input Data (8.0)
MIDS	Source Data (8.1)
MIDBC	Background Concentrations (8.2)
RAppM	Regulatory Application of Models (10.0)
AA	Appendix A to Appendix W, Summaries of Preferred Air Quality Models

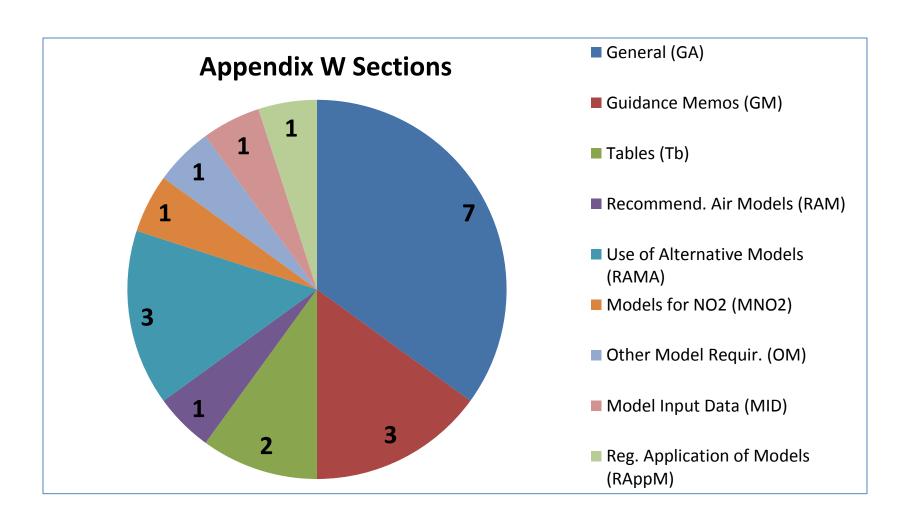
How has Appendix W been <u>helpful</u> to you in developing and defending a modeling demonstration? (Please provide examples)



## **Question 1 Comments**

- 13 out of 14 answered
- General consensus was that Appendix W is mostly helpful in defending modeling methodologies, as well as providing a general framework
- A few users commented that they mostly utilize the guidance and clarification memos, and would like to see them incorporated into Appendix W in the next revision

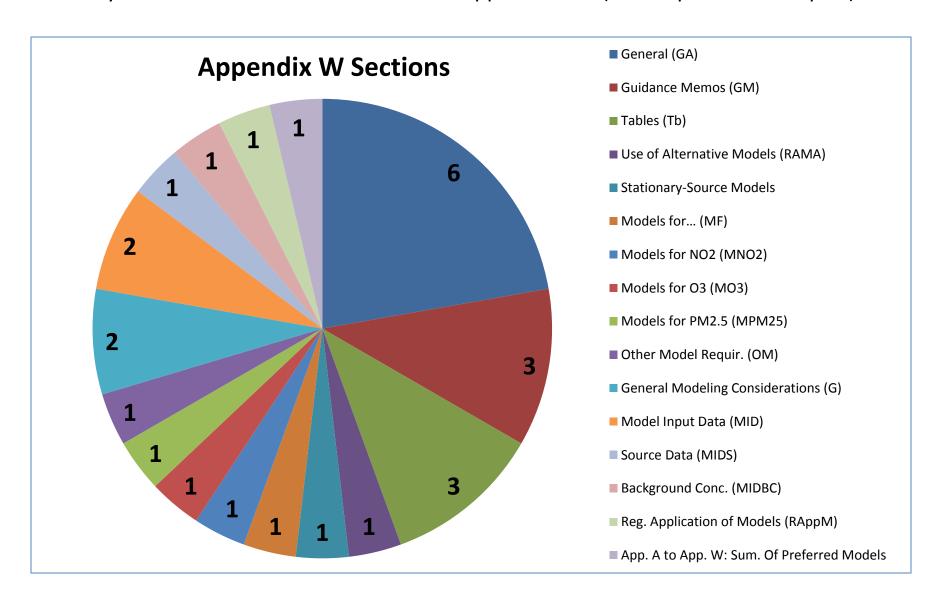
How has Appendix W been a <u>barrier</u> to developing and/or defending a modeling demonstration? (Please provide examples)



## **Question 2 Comments**

- 12 out of 14 answered
- Comments covered a variety of topics, most notably:
  - App. W needs to rewritten from the ground up, and reorganized
  - Use more definitive language
  - Guidance memos need to be incorporated
  - Needs to be revised every 5 years to keep up with NAAQS and model revisions

Consider your responses to questions 1 and 2. Based on these responses, what changes would you like to see made in a revision to Appendix W? (Please provide examples)



## **Question 3 Comments**

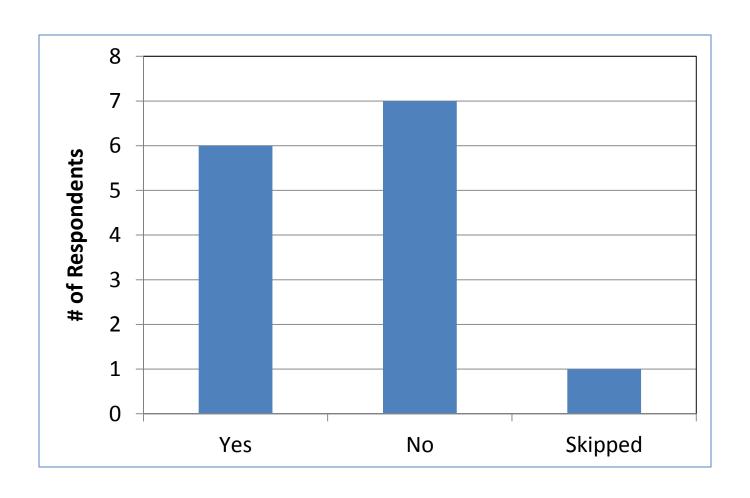
- 13 out of 14 answered
- Comments included:
  - Address new 1-hour standards and PM<sub>2.5</sub>
  - Clarification of what a significant conc. gradient is
  - Guidance memos should be included in App. W
  - Flexibility for nearby sources (tables 8-1 & 8-2) and background concentrations
  - More consistent tone and language
- A few commenters also stated that App. W should be updated more frequently

## **Question 4 Comments**

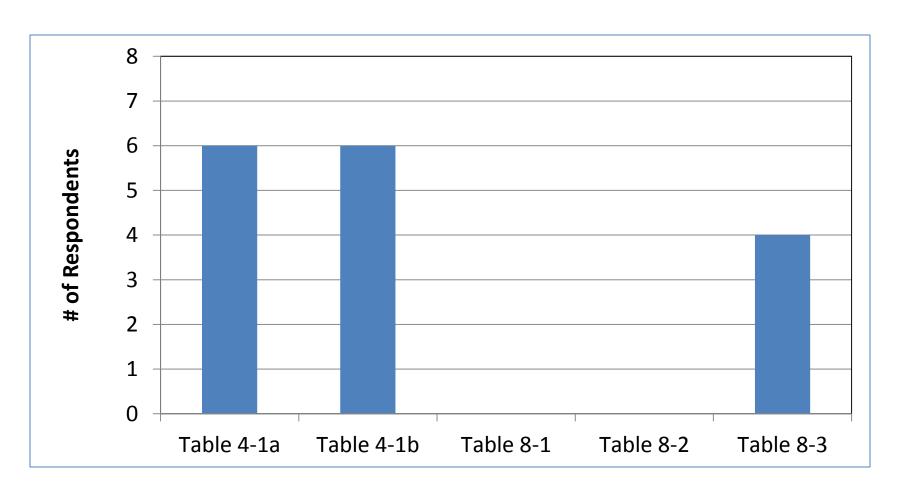
If you have needed to address the need of an alternative model, does Appendix W <u>provide enough information</u> for you to make on a <u>decision on the selection</u> of an alternative model? (Please provide details)

- 12 out of 14 answered
- Majority of commenters replied that App. W did not provide enough information
- Commenters also noted that even if there is enough information to make a selection of an alternative model, the process to get approval of the alternative model/modeling techniques takes too long (> 1 year), the steps are too bureaucratic, or that is just too difficult to get approval.

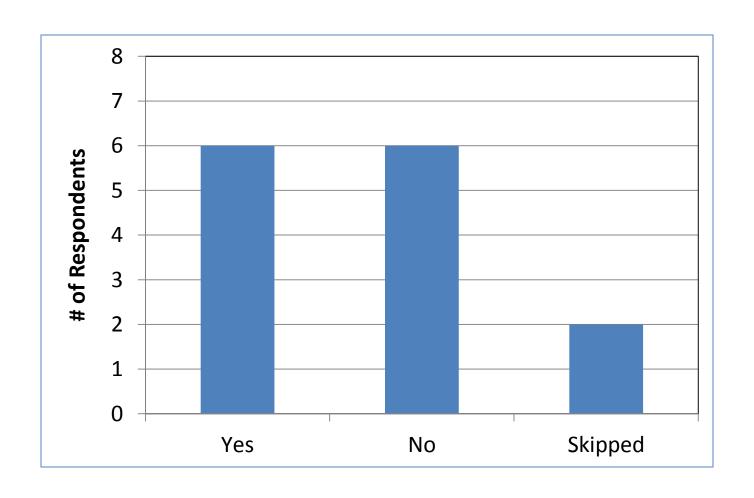
Do you find the tables in Appendix W useful?



If no to the previous question, which tables should be removed from Appendix W? (Check all that apply)



Should any tables be added to Appendix W?



## **Question 8 Comments**

If yes to the previous question, what tables should be <u>added</u> to Appendix W?

- 8 out of 14 answered (only 6 answered yes in previous question)
- Revisions to tables 8-1 and 8-2
- A few commenters asked for tables with the standards (i.e., NAAQS, PSD increments, SILs, etc.)
- One commenter suggested that AERSCREEN should replace tables 4-1a and 4-1b
- An additional commenter replied that the tables provide a quick and easy reference for specific issues

## Summary

- We need more state and local modelers to respond to the survey!
  - https://www.surveymonkey.com/s/LL7VMFZ
- All respondents had suggestions for improvement and revisions in Appendix W
- Key takeaways:
  - Revise Appendix W more frequently and regularly, and include the guidance memos
  - Keep a consistent tone and be more definitive in language used in Appendix W (i.e., don't use words like "may")
  - Define/clarify what a significant concentration gradient is
- EPA will receive these comments when Appendix W is officially opened for revision

# Thank you to everyone who has participated in the survey!

Jillian Baker, Ph.D.

South Coast Air Quality Management District

jbaker@aqmd.gov

909-396-3176

Local representative, Regions 6 – 10 mailing list

Melissa Sheffer
Minnesota Pollution Control Agency

melissa.sheffer@state.mn.us

651-757-2718

State representative, Regions 1 – 5 mailing list